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**From:** Trevor Hatch  
**Sent:** Thursday, 26 April 2018 12:01 PM  
**To:** Adjudication  
**Subject:** AA1000414– Council Solutions – submission”. Attention Tessa Cramond

**Categories:** Submission

ACCC  
Council Solutions  
AA1000414 Submission  
ATT: Tessa Cramond

I am writing regarding the submission by Council Solutions to jointly tender for Adelaide Council waste disposal services.

I operate a small waste disposal business (t/o \$1m-\$2m) in metro Adelaide servicing mainly central, northern and western suburbs. The majority of my work comprises the waste collection and its disposal from commercial operations as an independent contractor. I also indirectly service three of the amalgamated councils but only in the area of hard waste collection, the services of which I perform as a subcontractor to the principal contractor.

As in 2016, I object against the new proposal and respectfully request ACCC not to approve the submission as it seems to be the same as the 2016 proposal for hard waste collection. It appears to me that, if approved, the proposed arrangement is likely to create a monopoly situation. Currently, I believe that all of the Adelaide council work is shared among 3 large multinational companies. I suspect that neither of the 3 companies would be presently capable of handling all of the work areas as per the submission without making huge investments in infrastructure, vehicles and manpower. Naturally, with the security of a 23 year tenure, the successful tenderer could undertake the necessary investment with some degree of confidence. But what of the fate of the 2 unlucky companies who didn't win the contract? And what would be the fate of the smaller subcontractors like me who currently get some of the crumbs?

Furthermore, for Council Solutions to expect some sort of pricing uniformity between the various council regions is unrealistic because of the different distances to travel to respective dumping/disposal sites, and the effect on vehicle operating costs of traversing the different topographies of some of the council areas.

Overall, the proposed arrangement hardly seems conducive to a competitive environment and therefore not in the public's best interests.

Please contact me if you need any further information

Sincerely

Trevor Hatch